



American Cyanamid Company
Agricultural Division
P.O. Box 817
Hannibal, MO 63401
(314) 769-2011

REC'D

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RCAP

April 10, 2000

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Ms. Patricia Murrow, Project Manager
RCRA Corrective Action and Permits Branch
Air, RCRA, and Toxics Division
United States Environmental Protection Agency
Region VII
911 North 5th Street
Kansas City, KS 66101

RE: American Cyanamid Company

Dear Ms. Murrow:

The purpose of this correspondence is to respond to your letter to Cyanamid dated March 23, 2000, regarding the October 1996 Groundwater Investigation Report prepared by Geraghty & Miller, Inc., for American Cyanamid Company's Hannibal Plant. As was discussed with Mr. Maschler and members of the MDNR Hazardous Waste and Air Program staffs during a February 22, 2000 meeting, Cyanamid voluntarily retained Geraghty & Miller, Inc. (now known as Arcadis Geraghty & Miller), to conduct a groundwater study at the Hannibal Plant. The purpose of the study was to attempt to identify and delineate the presence of volatile organic compounds associated with the plant's water supply wells. As a result of this study, Geraghty & Miller issued a report summarizing their findings regarding the extent of organic contaminants in the groundwater. The study did not identify the source(s) of the contaminants present in the groundwater.

Cyanamid contacted the MDNR Northeast Regional Office in October 1996 regarding the results of the groundwater study. Cyanamid provided copies of the groundwater report to the MDNR. Cyanamid proposed to include management of the plant's groundwater plume as a part of the plant's ongoing NPDES Wastewater Discharge Permit renewal. Several discussions have been held with MDNR staff and associated correspondence has been exchanged regarding incorporation of conditions associated with management of the groundwater program as a part of the NPDES Permit renewal.

Although as indicated above, Cyanamid informed the MDNR of the groundwater condition, Cyanamid did not formally report the groundwater condition to the EPA Regional Administrator because the groundwater study did not appear to represent a "newly discovered release" in accordance with Special Permit Condition III.5, on page 5 of 10 of the HSWA permit. That



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section of the permit states that such reporting shall occur "...after commencement of the RFI..." There has been no RFI performed at the Hannibal facility. Moreover, the voluntary 1996 study did not associate the groundwater constituents with any release from a SWMU.

During the February 22, 2000 meeting, MDNR Hazardous Waste Program staff indicated that groundwater programs in Missouri have been typically managed under the Corrective Action Unit of the MDNR Hazardous Waste Program. Cyanamid's understanding from the discussions was that the MDNR anticipated they would suggest to EPA Region VII that the groundwater project be considered under the HSWA portion of the Hannibal Plant's RCRA Permit. Your letter of March 23, 2000 confirms the EPA's intent on managing the groundwater issue under the RCRA Permit.

Cyanamid is willing to proceed with the development of the groundwater program under the Hannibal Plant's RCRA Permit on the basis of your determination that the groundwater issue represents a newly discovered release in accordance with Special Permit Condition III.5 on page 5 of 10 of the HSWA permit. As such, we further agree to prepare and submit a work plan for further investigation within 90 days.

As was discussed during the February 22 meeting, Cyanamid would like to recommend that the MDNR Water Pollution Control Program staff be included in discussions related to development of the groundwater program. Cyanamid would appreciate the opportunity to meet with MDNR staff from the Hazardous Waste Program to discuss further development of a groundwater investigation program. We can make our staff available to meet either at EPA Region VII or at any MDNR office. We also extend an invitation to meet at the Hannibal Plant. I would appreciate it if you or MDNR staff would contact me at 1-573-769-2011, Ext. 2268, at your earliest convenience to discuss further development of this project.

Sincerely,

AMERICAN CYANAMID COMPANY
Agricultural Products Division

A handwritten signature in black ink, appearing to read 'J. Brad Willett', with a large, stylized 'J' and 'W'.

J. Brad Willett, P.E.
Manager, Environmental Services

dep
jbw\rcra renewal 99\groundwater.doc

cc: Mr. Arthur Groner, MDNR Hazardous Waste Program
Mr. David Maschler, MDNR Hazardous Waste Program
Mr. Richard Laux, MDNR Water Pollution Control Program
Ms. Irene Crawford, MDNR Northeast Regional Office



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RETURN RECEIPT REQUESTED



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